

1 Reed R. Kathrein (139304)  
2 Danielle Smith (291237)  
HAGENS BERMAN SOBOL SHAPIRO LLP  
3 715 Hearst Avenue, Suite 202  
Berkeley, CA 94710  
4 Telephone: (510) 725-3000  
Facsimile: (510) 725-3001  
5 reed@hbsslaw.com  
danielles@hbsslaw.com

6

7 *Attorneys Lead Plaintiff Trigon Trading Pty. Ltd.*

8

9

10 **UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

11

12 IN RE TEZOS SECURITIES LITIGATION

13 This document relates to:

14 ALL ACTIONS.

15 Master File No. 17-cv-06779-RS

16

17 **CLASS ACTION**

18 **DECLARATION OF REED R.  
KATHREIN IN OPPOSITION TO  
MOTION FOR DISTRIBUTION OF  
ATTORNEYS' FEES**

19 Date: N/A\*  
Time: N/A\*  
Courtroom: N/A\*  
Judge: Hon. Richard Seeborg

20 \* The Court's September 25 Order (ECF no.  
268) Vacated The October 29, 2020 Hearing

1 I, Reed R. Kathrein, Esq., pursuant to 28 U.S.C. § 1746, hereby declare as follows:

2 1. I am admitted to practice law before all of the courts of the State of California and  
3 I am admitted as counsel in this Action. I am a partner of the law firm Hagens Berman Sobol  
4 Shapiro LLP (“Hagens Berman”), counsel for Lead Plaintiff Trigon Trading Pty. Ltd. (“Trigon”).  
5 I respectfully submit this declaration in advance of the Settlement Conference scheduled for  
6 November 19, 2020.

7 2. I have personally participated in, overseen, and monitored the prosecution of this  
8 Action, and have otherwise been kept informed of developments in this Litigation by attorneys  
9 working with me and under my supervision. Thus, if called upon, I can testify to the matters set  
10 forth herein.

11 3. As counsel for Trigon, my firm was involved in all aspects of the litigation and its  
12 settlement.

13 4. I believe Trigon’s allocation of the attorneys’ fee portion of the settlement fund  
14 accurately reflects our respective plaintiffs’ firms’ relative contributions to the result achieved.

15 5. I have never told or suggested to Hung Ta that Trigon would propose an  
16 allocation that would result in his group receiving more than 25% of the total fees, nor am I  
17 aware of anyone else (*i.e.*, other than Hung Ta) proposing such an allocation of fees.

18 6. At no point have I or anyone at my firm denied to Hung Ta (or anyone else in his  
19 group) that Hagens Berman, Block & Leviton LLP, Robbins Geller Rudman & Dowd LLP, and  
20 Taylor-Copeland Law were working together. To the contrary, we stated in open court—in both  
21 this Court and the state court—that we were cooperating.

22 I declare under penalty of perjury that the foregoing is true and correct. Executed on this  
23 7th day of October 2020, at Berkeley, California.

24 By: /s/ Reed R. Kathrein  
25 REED R. KATHREIN  
26  
27  
28